

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**RE: PETITION OF BAY STATE GAS COMPANY
FOR APPROVAL OF REVISED TARIFFS**

DTE 05-27

SECOND SET OF INFORMATION REQUESTS OF LOCAL 273

[The following questions are based on or relate to the testimony of Steve Bryant.]

UWUA 2-1

Please provide a general description of the division of duties between Mr. Bryant and Mr. Cote, making sure to include (but not limited to) a description of their respective authorities and responsibilities for any changes in staffing levels, decisions regarding capital expenditures, expenditures on O&M, and customer service.

UWUA 2-2

Please provide a general description of the types of decisions which Mr. Bryant is authorized to make without approval from any officers or executives of NiSource versus those decisions where Mr. Bryant must receive approval from one or more NiSource officers or executives.

UWUA 2-3

Please provide the names of Mr. Bryant's three immediate predecessors, and the job title (e.g., president, CEO, etc.), as well as the dates of their tenures. Include a brief description of each individual's responsibilities in these operational areas: repairs, capital expenditures, customer service, maintenance.

UWUA 2-4

Provide a table listing the volume of Bay State's sales to customers, broken down by each year 1998 to 2004 and, for each year, also by major customer class.

UWUA 2-5

Please provide any analysis or comparisons performed by the company or its consultants to determine whether the test year expenses were in fact representative of "typical" expenses. Please be sure to include any analysis of the test year expenses in any category in comparison to expenses in any prior year or years to determine or evaluate whether the test year expenses were abnormally high or low.

UWUA 2-6

Please provide the level of NiSource's long-term and short-term debt for each year 1998 to 2004. To the extent Bay State carried any long-term or short-term debt in its own name during this period, also include the amounts of debt for Bay State.

UWUA 2-7

Please list on a quarterly basis for the period 1998 to date (to the extent each company has a credit rating) the credit ratings of Bay State, NiSource, and NiSource Financial Services, from each major credit rating agency.

UWUA 2-8

Please describe in detail the "human resources" services that NiSource Corporate Services performs for Bay State. Include in your answer (i) the extent to which NiSource Corporate Services can either suggest or require that Bay State change the staffing levels in any Bay State department, function or division; (ii) the extent to which Bay State has the authority to decide to change staffing levels and then call upon Corporate Services to assist in implementing those changes; (iii) the extent to which NiSource Corporate Services can either suggest or require Bay State to adopt or follow particular terms or levels of compensation for its employees (salaries, benefits and other compensation).

UWUA 2-9 Please provide copies of all documents that define or describe the relationship between or among Bay State, NiSource Corporate Services and NiSource in terms of which entity sets or changes Bay State's staffing levels, working conditions of Bay State's employees, or terms of compensation and benefits.

UWUA 2-10

Please provide any projections of future growth in the number of Bay State's customers made at or around the time of Bay State's merger with NiSource. Include all workpapers supporting such projections of customer growth.

UWUA 2-11

For each year 1998 to 2004, list by name and job title the 20 most highly-compensated executives of Bay State, NiSource and any NiSource affiliate, ranked in order of amount of compensation. Include in compensation all salaries, bonuses, stock options, and any other benefits whether provided in cash, in kind, through reimbursement or any other means.

To the extent that Bay State customer's are allocated anything less than 100% of the costs of compensation of any of these individuals, please list the percentage allocation and the basis for that allocation.

UWUA 2-12

Please explain what circumstances would result in Bay State reporting negative unaccounted for gas in any of its service quality reports to the Department regarding unaccounted gas.

UWUA 2-13: Please provide the month-by-month statistics for telephone response rate for the Springfield call center for each month of 2003. Include all underlying workpapers as well as any descriptive manuals or protocols that explain how calls are tabulated or logged; how the ultimate figures (% calls answered in 30 seconds) are compiled; and any adjustments made to the raw underlying data. To the extent that telephone response statistics are separately maintained for Bay State versus Northern Utilities customers (that is, not merged into a single report), please provide the information requested both for Bay State and for Northern.

UWUA 2-14

[Bryant testimony (p. 2-33)] Please describe all of the improvements that have been made at the call center.

UWUA 2-15

(a) Can Bay State customers pay their bills by credit card? If “yes,” do they incur any fee to do so, other than whatever usual fees the customer’s own credit card company may impose?

(b) Can Bay State customers make payments through any third party billing agent (excluding pay stations) and, if so, are there any fees imposed for doing so?

UWUA 2-16

(a) Does Bay State operate any arrearage forgiveness or arrearage management programs for its low-income customers?

(b) Is the company familiar with KeySpan’s “On Track Program,” WMECo’s “NU Start Program,” or the arrearage management programs being offered by NSTAR? Which individuals at Bay State track or monitor these programs?

(c) Has Bay State been asked by any group or organization representing low-income consumers to offer an arrearage management program? Who made the request, when was it made, and what was the company’s response?

UWUA 2-17

Regarding Mr. Bryant’s discussion of the efforts the company makes to educate its customers, who is in charge of determining which information appears on the company’s

web pages? Were those pages redesigned during 2005? Who was in charge, and from whom did that person solicit input or suggestions? Was there a period of time in May or June 2005 when there was no information on the web page regarding the low-income discount rate?

UWUA 2-18

Please provide a copy of any and all written communications including e-mails between or among any Bay State employee (or consultant), on the one hand, and the Low-Income Energy Affordability Network, Action, Inc. or any of its consultants or attorneys, on the other hand, regarding the design or delivery of the company's low-income energy efficiency programs, for the period January 1, 2004 to date.

UWUA 2-19

Please provide a copy of the training materials provided to new customer service reps regarding the Department's rules for billing and terminations, as well as such written training materials regarding the company's own practice and policies regarding billing and termination. Include all training materials and guidance regarding the amount of payments, in dollars or percent of bills owed, that customer service reps are instructed to seek from clients in arrears.

UWUA 2-20

Please provide a printout of all of the call screens available to a customer service rep at the Springfield call center (or any other location that handles customer calls) as well as any written reference materials accessible to these employees as they handle calls.

UWUA 2-21

To the extent not provide in response to UWUA 2-11, please provide total compensation provided to (i) Steve Bryant and (ii) Dan Cote for each of the years 1999 to present, including all wages, salaries, bonuses, stock options, use of vehicles, memberships, housing allowances, or any other thing of value.

UWUA 2-22

Please provide a month-by-month total of the number of customers on the company's low-income discount rates for the period January 2001 to date.

UWUA 2-23

Please provide the number of customers on whose behalf the company received fuel assistance payments, for the winter heating seasons beginning Nov. 1, 1999 to May 31, 2000 (and Nov. 1, 2000 to May 31, 2001, etc.) through to the heating season just ended.

UWUA 2-24

(Bryant testimony, p. 36) Please explain what Mr. Bryant means by the word “normal” when referencing adding \$20 million to the “normal” amount that it would otherwise spend on replacing steel mains. Including a table showing the amounts spent for steel infrastructure for each of the years 1998 to 2004; the currently projected amount for 2005; and the amount Bay State was planning to spend in 2006 to 2010 before developing the SIR plan that will ramp up these expenditures.

UWUA 2-25

Please either provide a reference to the appropriate portions of Mr. Cote’s testimony and exhibits or otherwise provide a percentage breakdown of the company’s mains by unprotected steel, cathodically protected steel, cast iron, plastic, or any other material type. Please provide the approximate time periods when the company or its predecessor companies would have been installing each type of main.

UWUA 2-26 Please provide a general description of who will perform the work connected with implementing the SIR program, focusing in particular on the relative roles of outside contractors and company employees in doing that work.

UWUA 2-27

Does the company currently predict any need to increase staffing levels among its own employees to implement the SIR program? If “yes,” please provide all written estimates, studies or reports regarding the staffing changes that the company will need to implement, including the job titles that will be affected and the number of new staff positions that will be needed.

UWUA 2-28

Please explain the mechanism through which any operating cost savings arising from the SIR program would be reflected in the proposed annual rate filings and flowed through to customers.

UWUA 2-29

Please explain the role that the company is proposing or contemplating for intervenors in the annual SIR filings. Specifically, does the propose or agree that it automatically will send intervenors in the present case a copy of those filings simultaneously with filing at the Department, and does it contemplate or agree that interested parties should have the right to file discovery?

UWUA 2-30

Please provide a copy of the decisions, orders or settlement agreements from Maine and New Hampshire referenced in Mr. Bryant's testimony and that approved or allowed a mechanism for recovering the costs of the main replacement programs in those states, or that reflected an agreement to consider such a mechanism.

UWUA 2-31

(a) For the period since the Metscan devices were first installed, please provide a copy of all communications between the company and the manufacturer or vendor of the Metscan devices (or with any third party) which in any way addressed problems with the devices, including but not limited to problems with the overall longevity of the devices, problems with the batteries, problems with accessing information from the meters, problems with transmitting the metered data onto telephone lines, unexpected costs of operating and maintaining the meters, or any other problem.

(b) Please provide analysis the company has performed at any time since the Metscan system was first installed regarding any unexpected increases in owning or operating the Metscan system, relative to initial estimates made by the company or provided by the vendor. Include any increased labor costs incurred by company meter readers who had to read meters in instances where the Metscan meters did not perform as anticipated.

UWUA 2-32

Please provide a copy of all written communications from Bay State to its meter readers or any other operational personnel regarding the installation, repair, maintenance and reading of the Metscan meters, starting from the date of initial installation. Include any written communications to employees regarding or addressing any problems with accessing or transporting data, with the batteries, with longevity of the units, or with exposure to the elements.

UWUA 2-33

Please identify by name and title the persons involved in the initial decision to install the Metscan system.

UWUA 2-34

Please identify by name and title the individuals involved in the decision to abandon the Metscan system and switch to the new Itron system. Include with this response a copy of all related internal communications among Bay State, NiSource and/or affiliated companies, whether in the nature of engineering or financial analysis, budget recommendations, operational considerations, etc.

UWUA 2-35

Please provide a copy of any lawsuits, demands, claims or complaints made by Bay State or any affiliated company against the makers or vendors of the Metscan system, for the period since the first Metscan devices were installed to the present date.

UWUA 2-36

Please list the name of every utility company in Massachusetts or in any other state which currently uses the Metscan system. If Bay State is aware of none, please list any utility of which Bay State is aware that previously used the Metscan system and the approximate time period during which it was in use.

UWUA 2-37

Please provide a summary of the key provisions of the Metscan lease, especially the starting year and duration and the various amounts to be paid. Include a copy of the lease itself.

UWUA 2-38

Please provide a table listing the company's annual costs of operating the Metscan system, excluding any lease costs provided in the prior response, for the period since the system was installed to date.

UWUA 2-39

Please describe the various lease options that may have been available at the time Bay State was negotiating with the maker/vendor of the Metscan system, focusing on the various lengths of lease term that may have been available.

UWUA 2-40

Please provide a copy of all written training or practice materials provided to (i) EP&S employees [Bryant testimony, p. 51] and (ii) other Bay State employees that in any way provide any guidance about referring low-income customers to the low-income weatherization assistance program and other government-funded programs rather than to EP&S for space-heating or water-heating inspections, repairs or replacements.

UWUA 2-41

Please provide a copy of any and all complaints that may have been made by or on behalf of any low-income customer, in the nature of any Bay State employee referring the low-income customer to EP&S or offering services from EP&S when in fact the customer could have received heating-system or water-heater services for free or at reduced cost from some other source.

Respectfully Submitted,

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